

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PERPETUAL ASHARE,

Case No.: 1:25-cv-02834- GHW-KHP

Plaintiff,

-against-

**SONTAG & HYMAN, P.C.,
MARC H. HYMAN,
EAST HARLEM MEC PARCEL C L.P.,
EAST HARLEM MEC PARCEL C
HOUSING FUND DEVELOPMENT
CORPORATION,
METRO 125, INC and
RICHMAN PROPERTY SERVICES, INC,**

Defendants.

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**DECLARATION IN SUPPORT OF REQUEST FOR CERTIFICATE OF DEFAULT OF
METRO 125, INC.**

STATE OF NEW YORK)
) ss.:
COUNTY OF KINGS)

I, Ahmad Keshavarz, hereby declares as follows:

1. I am a member of the Bar of this Court and am a partner at the Law Office of Ahmad Keshavarz, which along with Manhattan Legal Services are attorneys for plaintiff in the above-entitled action, and I am familiar with all the facts and circumstances in this action.
2. Jurisdiction of the subject matter of this action is based on federal question jurisdiction pursuant to the FDCPA, 15 USC 1692 *et al*, over Defendants Sontag & Hyman, P.C and Marc H. Hyman.
3. The court has supplemental jurisdiction over Defendant Metro 125, Inc. pursuant to 28 U.S.C. § 1367 as the state law claims against said defendant as those claims they share a common nucleus of operative facts with the federal claim and are so related to the FDCPA federal claim as to form part of the case or controversy under Article III of the United States constitution.
4. Defendant Metro 125, Inc. is indebted to plaintiff for violations of N.Y. General Business Law § 349, negligence, and gross negligence, as delineated in the Original Complaint [DE 1].
5. This action was commenced on April 4, 2025 by the filing of the summons and complaint. [DE 1]. A copy of the summons and complaint was served on the defendant Metro 125, Inc. on May 27, 2025 by personal service on Anthony Burris, who is of suitable age and

discretion and authorized agent at the New York Office of the Secretary of State [DE 24]. Proof of service by the Process Server was filed on June 3, 2025. [DE 24]. Defendant Metro 125, Inc. has not answered the complaint or moved to dismiss and the time for the Defendant to do so has expired.

WHEREFORE, plaintiff Perpetual Ashare requests that the default of Defendant Metro 125, Inc. be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part thereof has been paid.

Dated: Brooklyn, New York
July 7, 2025

/s/ Ahmad Keshavarz

Ahmad Keshavarz
Affiant
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